



Virgin Islands Relay FCC Certification Renewal Supplemental Information

BY EFCS and EMAIL

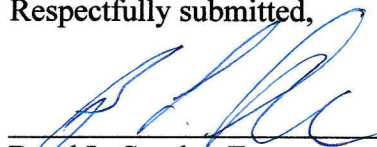
Dana Wilson
Disability Rights Office
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *TRS State Certification Application, CG Docket No. 03-123*

This filing supplements the application (“Application”) submitted by the Virgin Islands Public Services Commission (“VIPSC”) for renewal of the certification of Telecommunications Relay Service in the Territory of the Virgin Islands.¹ The attached supplement to the VIPSC TRS certification renewal application was prepared with the assistance of the Virgin Islands Telephone Corp. d/b/a Viya (formerly Innovative Telephone) (“Viya”) and Sprint Accessibility (formerly Sprint Relay).

I hereby certify that Virgin Islands Relay is in compliance with the rule sections noted in the Commission’s follow-up inquiry email.²

Respectfully submitted,


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Law Office of John H. Benham, P.C.
Counsel to the VIPSC

Attachment

¹ See Virgin Islands Public Services Commission, Application of the Virgin Islands Public Services Commission for Reauthorization of the Virgin Islands Telecommunications Relay Service (filed Mar. 27, 2018), [https://ecfsapi.fcc.gov/file/10327271316182/USVI%20PSC%20TRS%20Certification%20Application%20\(3-27-18\).pdf](https://ecfsapi.fcc.gov/file/10327271316182/USVI%20PSC%20TRS%20Certification%20Application%20(3-27-18).pdf).

² Email from ShaVonne Morris, Disability Rights Office, Federal Communications Commission, to Sandra Hodge, Viya, and John E. Moore, Sprint Accessibility (May 17, 2018). As the applicant that submitted the Application to the FCC, IPSC is responding to the Commission’s inquiry even though the inquiry was directed by the Commission to Viya and Sprint Accessibility.

SUPPLEMENTAL INFORMATION

64.604(a)(1)(v) Mandatory Minimum Standards

CAs answering and placing a TTY-based TRS or VRS call shall stay with the call for a minimum of ten minutes. CAs answering and placing an STS call shall stay with the call for a minimum of twenty minutes. The minimum time period shall begin to run when the CA reaches the called party.

Consistent with the requirement of 64.604(a)(1)(v), Sprint CAs answering or placing a STS call stay with the call for a minimum of twenty minutes.

64.606(d) Method of Funding

Except as provided in §64.604, the Commission shall not refuse to certify a state program based solely on the method such state will implement for funding intrastate TRS, but funding mechanisms, if labeled, shall be labeled in a manner that promote national understanding of TRS and do not offend the public.

Consistent with the requirement of 64.606(d), communications promoting understanding of Virgin Islands Relay, such as surcharge on local telephone bill, are labeled in a manner that is respectful and does not offend the public.

64.5105 – 64.5110 TRS Customer Proprietary Network Information

Because 64.606(b)(1)(i) requires that state TRS programs establish that they meet or exceed all operational, technical, and functional minimum standards contained in 64.604, and 64.604(d) incorporates by reference the TRS CPNI rules, the states are required to establish that their programs comply with the CPNI rules.

The VIPSC receives inquiries and complaints from customers of the utility companies operating in the U.S. Virgin Islands and acts a mediator or facilitator in resolving complaints. To the extent the VIPSC receives a complaint regarding relay service, the VIPSC notifies the Relay Provider (Sprint Accessibility) and the complaint is treated in a confidential manner. Complaints and resolutions are then filed with the FCC annually. No customer specific information is shared, distributed, or sold by the VIPSC. The VIPSC houses no other confidential information regarding relay services.

By contract, Virgin Island Relay's provider, Sprint Accessibility, is required to comply with the TRS CPNI rules. For example, Sprint Accessibility files a CPNI compliance certification with the FCC annually. Sprint keeps billing and account information in customer profiles, and it is not used in any manner other than to provide necessary actions in the provision of relay service. The information is not shared or sold by Sprint Accessibility.